



George Latimer
County Executive

Office of the County Attorney

John M. Nonna
County Attorney

July 26,

Hon. Philip M. Halpern
United States District Judge
U.S. District Court
300 Quarropas Street
White Plains, New York 10601-4150

Application denied without prejudice to renew. The Proposed Confidentiality Agreement is different from the Model Confidentiality Stipulation and Proposed Protective Order available on this Court's individual webpage. See Rule 1(I) of this Court's Individual Practices.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 138.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 27, 2021

Re: *Dante Edoardo Daly v. Westchester County Board of Legislators*
19 Civ. 4642 (PMH)

Dear Judge Halpern,

I represent the Defendant Westchester County Board of Legislators (the "BOL") in the above-referenced action.

On behalf of the BOL, and with the consent of Plaintiff by counsel, I write to inform Your Honor that the parties have entered into a proposed Confidentiality Agreement and to request, respectfully, that Your Honor so-order the same. Considering the subject matter of this action and the parties' disclosure obligations, which necessarily requires the exchange of medical reports/documents as well as documents that fall within the purview of legislative privilege, the parties submit that such an agreement and order is appropriate.

In closing, I thank you for your time and consideration of the foregoing. Should Your Honor's staff need to contact me, I am available by phone at 914.995.3630 or by email at ggma@westchestergov.com.

Respectfully,

/s/ Giacomo G. Micciche

Giacomo G. Micciche
Assistant County Attorney

